

Laura Salerno Owens, OSB #076230
LauraSalerno@MarkowitzHerbold.com
David B. Markowitz, OSB #742046
DavidMarkowitz@MarkowitzHerbold.com
Harry B. Wilson, OSB #077214
HarryWilson@MarkowitzHerbold.com
Anna M. Joyce, OSB #013112
AnnaJoyce@MarkowitzHerbold.com
Chad A. Naso, OSB #150310
ChadNaso@MarkowitzHerbold.com
Anthony Blake, OSB #163446
anthonyblake@markowitzherbold.com
MARKOWITZ HERBOLD PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085 | Fax: (503) 323-9105

Laura L. Ho (admitted *pro hac vice*)
lho@gbdhlegal.com
Barry Goldstein, Of Counsel (admitted *pro hac vice*)
bgoldstein@gbdhlegal.com
James Kan (admitted *pro hac vice*)
jkan@gbdhlegal.com
Byron Goldstein (admitted *pro hac vice*)
brgoldstein@gbdhlegal.comA
Katharine L. Fisher (admitted *pro hac vice*)
kfisher@gbdhlegal.com
Mengfei Sun (admitted *pro hac vice*)
msun@gbdhlegal.com
GOLDSTEIN, BORGES, DARDARIAN & HO
155 Grand Avenue, Suite 900
Oakland, CA 94612
Telephone: (510) 763-9800 | Fax: (510) 835-1417

Attorneys for Plaintiffs and Opt-In Plaintiffs

[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and on
behalf of others similarly situated,
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant

Case No. 3:18-cv-01477-JR

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
PAGE LIMITS FOR BRIEFING ON
PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

Plaintiffs Kelly Cahill, *et al.* (“Plaintiffs”) and Nike, Inc. (“Nike” or “Defendant”) (collectively, the “Parties”), through their respective counsel, hereby stipulate and agree to the following page limits for the Parties’ briefing on Plaintiffs’ Motion for Class Certification, and respectfully request that the Court enter an order establishing the same.

STIPULATED PAGE LIMITS

Given the complexity of this case, the Parties hereby stipulate and agree to, and request that the Court order, the following page limits for the Parties’ briefing on Plaintiffs’ Motion for Class Certification:

Class Certification Briefing	Page Limit
Plaintiffs’ Opening Brief	60
Nike’s Opposition Brief	60
Plaintiffs’ Reply Brief	35

Nothing in this Stipulation shall prohibit Nike from requesting leave of Court to file a Sur-Reply Brief in Opposition to Plaintiffs’ Motion for Class Certification, and Plaintiffs may oppose Nike’s request.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: December 23, 2021

Respectfully submitted,

GOLDSTEIN, BORGAN, DARDARIAN & HO

/s/ James Kan

Laura L. Ho (admitted *pro hac vice*)
 Barry Goldstein, Of Counsel (admitted *pro hac vice*)
 James Kan (admitted *pro hac vice*)
 Byron Goldstein (admitted *pro hac vice*)
 Katharine L. Fisher (admitted *pro hac vice*)
 Mengfei Sun (admitted *pro hac vice*)
 MARKOWITZ HERBOLD PC
 Laura Salerno Owens, OSB #076230
 David B. Markowitz, OSB #742046
 Harry B. Wilson, OSB #077214

Anna M. Joyce, OSB #013112

ACKERMANN & TILAJEF PC
Craig Ackerman (admitted *pro hac vice*)
cja@ackermanntilajef.com
1180 S Beverly Drive, Suite 610
Los Angeles, CA 90035
Tel: (310) 277-0614
Fax: (310) 277-0635

INDIA LIN BODIEN LAW
India Lin Bodien (admitted *pro hac vice*)
india@indialinbodienlaw.com
2522 North Proctor Street, #387
Tacoma, WA 98406-5338
Tel: (253) 503-1672
Fax: (253) 276-0081

Attorneys for Plaintiffs and Opt-In Plaintiffs

Dated: December 23, 2021

Respectfully submitted,

/s/ Felicia Davis

Daniel Prince (*pro hac vice*)
danielprince@paulhastings.com
Zach P. Hutton (*pro hac vice*)
zachhutton@paulhastings.com
Felicia A. Davis (*pro hac vice*)
feliciadavis@paulhastings.com
Laura E. Zabele (*pro hac vice*)
laurazabele@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, Twenty-Fifth Floor
Los Angeles, CA 90071-2228
Tel: (213) 683-6000
Fax: (213) 627-0705

Amy Joseph Pedersen, OSB No. 853958
amy.joseph.pedersen@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Tel: (503) 224-3380
Fax: (503) 220-2480
Attorneys for Nike, Inc.

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: December 23, 2021

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan

James Kan (admitted *pro hac vice*)

[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation Regarding Page Limits for Briefing on Plaintiffs' Motion for Class Certification and hereby enters the following page limits:

Class Certification Briefing	Page Limit
Plaintiffs' Opening Brief	60
Nike's Opposition Brief	60
Plaintiffs' Reply Brief	35

Nothing in this Order shall prohibit Nike from requesting leave of Court to file a Sur-Reply Brief in Opposition to Plaintiffs' Motion for Class Certification, and Plaintiffs may oppose Nike's request.

IT IS SO ORDERED.

Dated:

JOLIE A. RUSSO
United States Magistrate Judge